

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 07 CR 733
)	
v.)	Judge Milton I. Shadur
)	
OLUBUNMI MASHA ,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR ADDITIONAL TIME
TO FILE PRE-TRIAL MOTIONS**

The Defendant, Olubunmi Masha, through her undersigned attorney, Scott J. Frankel, moves this Court for an additional three (3) weeks to file any pre-trial motions. In support thereof, Defendant states as follows:

1. The Defendant's pre-trial motions are currently due on Friday, March 28, 2008.
2. The Government has produced approximately 800 pages of discovery in this matter, including extensive financial records, field reports, and transcripts.
3. Scott J. Frankel, attorney for the Defendant, has been on trial since February 5, 2008, in *United States v. Delatorre, et al.*, Case No. 03 CR 90, before Judge Castillo, in the United States District Court for the Northern District of Illinois. This trial is expected to be completed during the first week of April.
4. Counsel has spoken to the prosecutor assigned to this case, AUSA Barry Elden, and Mr. Elden has indicated that he has no objection to this three week extension.

WHEREFORE, for all the foregoing reasons, it is respectfully requested that the Defendant's Motion For Extension be granted and the Defendant be given until **April 18, 2008**, to file pre-trial motions.

Respectfully submitted,

/s/ Scott J. Frankel
Defendant's Attorney

Scott J. Frankel
Frankel & Cohen
77 W. Washington #1720
Chicago, Illinois 60602

March 27, 2008